

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
W. R. GRACE & CO., <u>et al.</u> ,)	Case No. 01-01139 (JKF)
)	(Jointly Administered)
)	
Debtors.)	

**APPENDIX TO OPPOSITION OF W.R. GRACE & CO.
TO CLAIMANTS' MOTION FOR SUMMARY JUDGMENT**

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August 8, 2003

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COPY

IN THE UNITED STATES BANKRUPTCY COURT

FOR THE DISTRICT OF DELAWARE

IN RE:

Bankruptcy No. 01-1139

W.R. GRACE & COMPANY, et al.,

Chapter 11

Debtors

DEPOSITION of ELWOOD S. WOOD

February 5, 2003

9:24 a.m.

W.R. Grace & Company

62 Whittenmore Avenue

Cambridge, Massachusetts

Reporter: Michael D. O'Connor, RPR

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2

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23

24

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1 I N D E X

2 Deposition of: Direct Cross
3 ELWOOD S. WOOD
4 By Mr. Turkewitz 5

5

6

7 E X H I B I T S

8 No. Page
9 1 Memo to F.W. Eaton, H.C. Duecker,
10 E.S. Wood and H.A. Eschenbach from
11 O.M. Favorito, dated 5/23/80 80

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1 your deposition was taken in 1988. Do you recall
2 that?

3 A. I don't recall the details, but I do recall
4 being deposed.

5 Q. Okay. On how many occasions have you been
6 deposed?

7 A. To my recollection, that was the only
8 occasion.

9 Q. Have you ever consulted for W.R. Grace with
10 regard to asbestos-related cases besides this case
11 here?

12 A. No.

13 Q. Sir, you were general manager of Grace's
14 Zonolite business from approximately 1977 until
15 1982; is that correct?

16 A. I don't have a mind for dates, so I'll have
17 to go by whatever the record may indicate, but
18 that's approximately correct.

19 Q. 1981, 1982, in that time frame?

20 A. Something like that.

21 Q. Who served as general manager of the
22 Zonolite business prior to 1977?

23 A. Mr. Brown.

24 Q. Who served as general manager of the

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1 A. To avoid inhaling asbestos-laden area.

2 Q. Now, with respect to housekeeping and
3 education, was that done regardless of the levels of
4 asbestos in the plant?

5 A. I'm really trying to think about what we
6 may have done in plants which were using South
7 Carolina concentrate in order to answer your
8 question. It was certainly done in all plants which
9 handled the Libby concentrate. It certainly was
10 done with much greater detail in Libby itself where
11 we had a very serious problem.

12 Q. At some point grace was able to get the
13 levels at Libby and the levels in the plant to be
14 within the OSHA standard; is that correct?

15 A. Yes.

16 Q. But Grace continued to educate its
17 employees even after that, did it not?

18 A. Yes, I think so. I can speak only for my
19 watch.

20 Q. And Grace continued with the housekeeping
21 measures that we talked about as well?

22 A. Yes.

23 Q. Now, when you first started as general
24 manager of the Zonolite business, do you recall

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1 testing being conducted to determine the airborne
2 levels of asbestos that could result during
3 installation of Zonolite attic insulation?

4 A. Yes, I know we made some tests.

5 Q. And were you responsible for that decision
6 to test?

7 A. Yes.

8 Q. Why did you want to conduct that testing?

9 A. It was mandated that we test all of our
10 products. The occupational safety and health
11 authorities promulgated regulations, and among those
12 regulations were requirements that all products be
13 tested in their end use. So we were complying with
14 those requirements.

15 Q. Do you recall the results that you received
16 early on?

17 A. On what?

18 Q. With regard to the airborne levels during
19 installation of the Zonolite attic insulation.

20 A. I don't specifically recall individual
21 results. The testing went through phases in trying
22 to refine representative protocols for how the
23 product was used. Initially there were crude tests
24 that didn't measure any particular use, but rather,

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1 measured the amount of fiber that could be
2 liberated, so-called prop tests.

3 That was helpful indiscriminate go higher
4 contamination from lower contamination, but didn't
5 really give much information on how the product
6 would actually behave in its end use.

7 With respect to attic insulation, there
8 were tests performed in a mock attic, and that was
9 followed by tests in actual homes where, you know,
10 you went and did what you expected the homeowner
11 would do.

12 Q. Early on when you first received the
13 initial results of testing, do you recall discussing
14 contingency relating to Zonolite attic insulation in
15 1977?

16 A. Yes.

17 Q. Do you recall that one of the contingencies
18 included withdrawal of Zonolite attic insulation
19 from the market?

20 A. Yes.

21 Q. Why was this option addressed?

22 A. At the time of my arrival, the Consumer
23 Products Safety Commission was considering
24 regulations banning the use of asbestos in consumer

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1 products, and therefore, with the pending, but still
2 unresolved issue of whether or not a material such
3 as ours, with small amounts of contaminant, would be
4 included in their ban, we felt it necessary to make
5 plans in case the Consumer Products Safety
6 Commission required us to withdraw the product.

7 Q. Do you recall the Consumer Products Safety
8 Commission indicating at that time that they
9 considered any exposure to asbestos to be dangerous?

10 A. I guess that was a very conservative
11 operating practice. I don't recall that they said
12 any exposure, because, in fact, they were busily
13 identifying the risk factors associated with various
14 uses.

15 Q. Do you also recall at that time discussions
16 about putting asbestos warnings on bags of Zonolite
17 attic insulation?

18 A. Yes.

19 Q. Who made that proposal?

20 A. It was a part of the contingency plan --

21 MR. FLATLEY: Object to the form of the
22 question. Go ahead.

23 A. It was a part of the contingency plan. It
24 was never proposed to do it. There was never a

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1 decision to do it. It was an exercise that we went
2 through in case we were required to do it.

3 Q. And the warning language specifically
4 identified asbestos; is that correct?

5 MR. FLATLEY: Do you mean the warning
6 language that was being considered as part of the
7 contingency plan?

8 MR. TURKEWITZ: Yes.

9 A. I would think so. I would have to refresh
10 my memory on that point.

11 Q. Why was asbestos specifically identified in
12 the language?

13 A. Because that was the issue to be addressed
14 by the Consumer Products Safety Commission.

15 Q. And was it felt it would be important to
16 actually identify asbestos in the warning?

17 A. If the Consumer Products Safety Commission
18 required you to do so, yes.

19 Q. Do you recall discussions about the impact
20 of placing an asbestos warning label on bags of
21 Zonolite attic insulation?

22 A. Yes.

23 Q. What do you recall about those discussions?

24 A. That it would have a depressant effect on

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1 sales.

2 Q. Why is that?

3 A. Just people's fear of the unknown.

4 Q. Was a decision made to not place asbestos
5 warning labels on bags of Zonolite attic insulation?

6 A. Yes.

7 Q. And who made that decision?

8 A. I think it was a collective decision.

9 Certainly I being responsible for the business had a
10 lot to say about that.

11 Q. Who else was involved in making that
12 decision?

13 A. We met with our attorneys, we met with our
14 health and safety people, we met with outside
15 experts on the effect of exposure to asbestos, we
16 participated in hearings of the OSHA regulatory
17 authorities, we counseled at one point with the
18 Consumer Products Safety Commission.

19 It was a long process. It wasn't a quick
20 nor easy decision

21 Q. You mentioned that you counseled with your
22 health and safety people. Are you talking about at
23 W.R. Grace?

24 A. Yes.

EXHIBIT 2



BACKGROUND

May 21, 2003

EPA's Pilot Study to Estimate Asbestos Exposure from Vermiculite Attic Insulation

Background

Due to a variety of questions regarding vermiculite attic insulation, in the Spring of 2001, EPA began a small scale study to better understand the possible levels of asbestos in vermiculite attic insulation (VAI) and whether homeowners are potentially exposed to low levels of asbestos from vermiculite attic insulation. This preliminary, first phase study was designed to: (1) obtain a rough estimate of the amount of asbestos in attics with vermiculite attic insulation; and (2) obtain a rough estimate of a person's potential exposure to asbestos while performing common household activities. The results of this preliminary study do not indicate a need to change the Agency's longstanding and current guidance on managing asbestos, which is that homeowners should not disturb asbestos-contaminated material or, if disturbance is necessary, to hire professionals for removal. The Agency will use the results of this preliminary study to initiate further studies on vermiculite attic insulation and other asbestos related issues.

Study of Six Vermont Houses

The contractor hired by EPA, Versar Inc., has conducted 20 active simulations in six homes in Vermont and in a containment unit designed to simulate an attic environment in order to examine exposure to VAI. The pilot study examines the potential exposure associated with a number of activities, including:

- Installing and removing VAI;
- Performing wiring/small renovations in an attic that contains VAI;
- Using an attic that contains vermiculite insulation as a storage space;
- Living in a house where such VAI disturbances occur; and
- Background exposure associated with living in a house with VAI.

The study looked at six homes in Vermont with VAI – five were temporarily unoccupied and one was abandoned. Bulk samples of the VAI were collected and tested for asbestos contamination, as were ambient air samples from the attic, the living space, and outside the houses. Five of the houses were temporarily unoccupied at the time of the study and the insulation was not disturbed to avoid potential future exposure to the returning residents. Disturbances were conducted in the sixth abandoned house.

In these five houses, the asbestos content of the vermiculite was as high as 2% in bulk samples of the vermiculite attic insulation, yet asbestos was not detected in the air or dust samples. In the abandoned house, no detectable amount of asbestos was found in the bulk vermiculite sample. Yet, when the insulation was disturbed by performing six attic-use simulations (wiring, hanging a ceiling fan, etc.), small amounts of asbestos were detected in the air during the disturbance.

Study of Vermiculite Containing Products and Simulated Use

The study also sampled 10 vermiculite attic insulation products and simulated their use in the containment unit meant to represent an attic. The study analyzed five products from four different stores, as well as vermiculite from 3 different lots the Seattle Public Utility storage area, and two partially used bags of VAI from two residents of the State of Washington. The study analyzed 13 bulk samples of these 10 different vermiculite insulation products. Air monitoring was conducted during simulated consumer use of 6 of the products in the containment unit.

The results of these simulations showed that the disturbance of vermiculite attic insulation resulted in the release of asbestos fibers – the more aggressive the disturbance, the more fibers detected. These simulations also found that the absence of asbestos in the bulk VAI does not necessarily mean an absence of asbestos in the air after a disturbance.

General Conclusions of the Pilot Study

This small scale study provided the following key findings and identified areas for additional evaluation which EPA is seeking to address through its Asbestos Action Plan and research agenda currently under development:

- Disturbed vermiculite attic insulation can create a potential asbestos exposure risk to consumers.
- Bulk samples of vermiculite attic insulation that tested negative for asbestos contamination are not reliable for determining whether there are asbestos fibers elsewhere in the attic or whether a disturbance of the VAI would result in the release of asbestos fibers.
- Additional studies are needed to better understand any potential risks from asbestos contaminated vermiculite attic insulation and to develop more accurate analytical testing procedures.

EXHIBIT 3

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

-----X

In re:

W. R. GRACE & CO., et al.,

Debtors.

Chapter 11

Case No. 01-01139 (JKF)

(Jointly Administered)

-----X

12 Deposition of MORTON CORN, Ph.D., B.Ch.E., CSP
13 Linthicum, Maryland
14 Thursday, May 29, 2003
15 9:08 a.m.

25 Reported by: Marianne R. Hewitt

COPY

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1 Deposition of MORTON CORN, Ph.D., B.Ch.E.,
2 CSP, held at:

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6

MARRIOTT AT THE BWI AIRPORT

7

1743 West Nursery Road

8

Board Room Number One

9

Linthicum, Maryland 21090-2906

10

(410) 859-8300

11

12

13

14

Pursuant to agreement, before Marianne R.

15

Hewitt, Reporter and Notary Public in and for the

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State of Maryland.

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Morton Corn, Ph.D. - May 29, 2003

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A P P E A R A N C E S

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1 here today that ZAI could be removed safely by
2 qualified contractors?

3 A. I haven't seen nor heard of a -- the type of
4 removal that concerned me in the early and mid '80s for
5 years. My conclusion has been those fly-by-night
6 companies are opportunistic companies and no longer in
7 the business, and the ones that are are doing good work
8 today.

9 Q. And I remember one of your concerns about
10 removal in a traditional ACM in buildings was you had
11 to tear the fabric of the building apart to get to it.

12 A. That's right.

13 Q. With respect to ZAI it appears at least that
14 it may be a much easier removal with a vacuum truck, I
15 guess.

16 A. That's correct.

17 Q. Okay. So that would certainly seem to make
18 it feasible without endangering people the way you were
19 concerned about in the traditional buildings.

20 A. Well, I'm really not concerned about the
21 removal, even if the homeowner does it with ZAI.

22 I'd recommend the homeowner get specialists'
23 help, but this is really a once in a lifetime
24 occurrence for a homeowner that removes it. And I
25 think that's the dominating factor here, that exposure

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1 is not only a function of concentration but duration of
2 exposure.

3 So I think it's appropriate we recommend the
4 specialists but let us say the homeowner goes ahead on
5 their own, they would get some exposure during that
6 removal, but I don't think the integrated dose of that
7 exposure would concern me.

8 Q. Have you seen any studies indicating the
9 fiber levels that a homeowner would get while removing
10 an entire attic of ZAI?

11 A. No, I haven't, but I would -- I think that
12 is -- can be modeled and calculated on the base of the
13 data we have in hand for simulations and an assumption
14 as to the duration of removal, and we have exposures
15 during that type of removal by a homeowner scooping it
16 or getting it out.

17 So I think we could come up with a pretty
18 good estimate of what that once-in-a-lifetime exposure
19 or twice in a lifetime, if it's two homes, would be.

20 In terms of an integrated fiber per cc. years
21 dosage, it would be very low.

22 Q. All right. Would you recommend that a
23 homeowner wear a respirator?

24 A. Yes, I always -- I think you may recall, I've
25 always recommended respiratory protection, and I've

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1 always recommended to employers that if employees
2 request it, they use a respirator.

3 And I used a respirator when I installed
4 fibrous glass in my attic in Pittsburgh. I mean I just
5 think it's a good idea.

6 Q. You're not talking about the Sears dust mask,
7 the white masks that people use for painting, are you?

8 A. I think for this job they would help, they're
9 about 90 percent effective. If the homeowner has a
10 better cartridge respirator, that's the appropriate
11 respirator. But in dealing with the large spectrum of
12 homeowners, I suspect it would be the dust mask that
13 would probably be used.

14 Q. And by dust mask, so we're talking about the
15 same thing, we talked about the ones that come five in
16 a package, the white ones with the little clip --

17 A. Yes.

18 Q. -- that you stick around your face.

19 A. Well, I think realistically that's probably
20 what most homeowners would utilize and not get a
21 cartridge respirator.

22 Q. Right.

23 A. So this would offer a degree of protection
24 over and above no protection, and I already stated I
25 would not be concerned with a lifetime -- once in a

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1 lifetime exposure without protection.

2 Q. Okay. So you wouldn't be concerned if a
3 homeowner went up there and vacuumed the material out
4 himself or herself without a respirator at all.

5 A. That's correct, for once -- for that kind of
6 frequency of occurrence.

7 Q. Okay.

8 A. I think that's the difference between the
9 tenure of plaintiffs' experts in this litigation versus
10 the position I'm taking, and plaintiffs have shifted in
11 their experts.

12 They're tuned now to avoidance of all
13 exposure. Any exposure is hazardous, and I've
14 addressed that issue in the supplement of my report.

15 I am not taking the position that any
16 exposure is hazardous, I don't believe it is. And I
17 believe that the risk, which I term hypothetical risk,
18 from a once in a lifetime removal is very low, if it
19 exists at all.

20 Q. I saw a calculation you did in your report
21 about how much air somebody breathes at what fiber
22 level, et cetera.

23 Without getting into, you know, specific
24 numbers, would it be ballpark correct that a person up
25 there removing ZAI in his or her attic with no

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1 it was virtually everybody involved in litigation, but
2 I never did serve on that. I just did not think it was
3 appropriate.

4 Q. Have you been asked by any other government
5 agency to advise on the issue of ZAI?

6 A. No.

7 Q. Have you been asked by any homeowners to
8 consult on ZAI in their home?

9 A. No.

10 Q. Okay. Have you been asked by anyone other
11 than W. R. Grace to do anything in connection with ZAI?

12 A. I've run into ZAI and been asked in a sense,
13 but I'm assisting the Navy in environmental hazard
14 litigation where they close a facility or reduce it and
15 there's a suit filed for back pay. So I inspect the
16 buildings involved.

17 These are nonoccupational environment and
18 they're like the buildings issues we dealt with. And
19 in doing that in Pearl Harbor I encountered attic
20 insulation.

21 Q. In --

22 A. So I had to address -- similar to my
23 inspections of buildings I addressed the form of the
24 asbestos, the concern for the asbestos and so on.

25 But I did encounter attic insulation in some

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1 of the very old buildings on the Pearl Harbor Naval
2 Shipyard Base.

3 Q. Did you write a report that included the ZAI
4 buildings?

5 A. No, just notes of what I saw, inspection
6 notes.

7 Q. Have the facilities been closed that had the
8 ZAI?

9 A. Yeah, the whole building was closed for
10 either remodeling or tearing down. If they could get
11 the money to remodel they would remodel, if they
12 couldn't they were going to demolish.

13 Q. When was this that you were involved with ZAI
14 at Pearl Harbor?

15 A. I did my inspections two years ago.

16 Q. Do you know what's happened to those
17 buildings?

18 A. No, but I'll be going back so I will find
19 out.

20 Q. Okay. Did you make any recommendations on
21 what they should do about the ZAI if they tore the
22 building down?

23 A. Just that it should be appropriate removal.
24 I assumed it had some asbestos and I -- and they do
25 have appropriate removal.

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1 They have standard operating procedures for
2 professional removers. And so it was really iterating
3 in that sense what they already knew.

4 There were different forms of asbestos
5 materials in the buildings I inspected from thermal to
6 pipe insulation, boiler insulation. I was encountering
7 a lot of different ACM in the older buildings.

8 Q. And did you make any calculations of what the
9 cost would be for the asbestos removal for that aspect
10 of the building?

11 A. No, I didn't get into any of that.

12 Q. Did you have any discussions with them of the
13 removal technique for ZAI? We talked earlier about a
14 vacuum truck or scooping it up or --

15 A. No, we -- again, we didn't get into that. It
16 was mainly visual qualitative observation of the
17 potential sources of asbestos that were the basis for
18 the claim for 25 years back pay of 8 percent of people
19 who worked in these buildings.

20 Q. What's happened with the litigation, do you
21 know?

22 A. There will be a hearing. The two I was
23 involved with, I assisted the Navy in Mechanicsburg and
24 the Navy was successful.

25 And I assisted the Air Force at Kelly Air

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1 Force Base. The Navy recommended me to Kelly. These
2 are the JAG attorneys I worked with, and my role is
3 really to educate them to asbestos and to tutor them in
4 the issues. And we prevailed in Kelly and now it's
5 Pearl Harbor.

6 Q. Good work leads to more assignments, and
7 Pearl Harbor is not a bad one.

8 A. Yeah. Yeah.

9 Q. With the small percentage of asbestos, we've
10 seen up to two percent of asbestos in the ZAI, out at
11 Pearl Harbor why wouldn't you just recommend they knock
12 it down, it's only going to be a day or two?

13 A. Well, the ZAI is a minor part of these
14 buildings, the consideration. These are enormous
15 buildings dating from the -- they may date -- I have
16 those, I think it was the '20s or the '30s.

17 In terrible state of repair, the roofs were
18 in bad shape, there were pigeon droppings, there
19 were -- I mean the -- we have -- despite the enormous
20 defense budget, I learned that very little goes into
21 maintenance of facilities.

22 So these buildings are sealed, they're really
23 sealed off to any entry. And I was trying to
24 reconstruct what was there when people worked in them,
25 and the degree of hazard.

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1 Q. Well, how did that get you into a
2 recommendation that if the buildings were going to be
3 remodeled or demolished that the ZAI be removed?

4 A. It was just an add on to my report just
5 saying you're aware that -- just reminding them, which
6 is gratuitous because they knew.

7 But in my notes I would say it should be
8 remembered that this asbestos should be removed by
9 professional removal specialists.

10 Q. Okay.

11 A. That's all it was, a footnote at most.

12 Q. Okay. All right. And I want to be sure we
13 covered this to save some time of a lot of questions.

14 Are you doing anything else related to ZAI or
15 run into it, talked about it, bumped into it, consulted
16 with anybody?

17 A. No.

18 Q. Okay. How much time would you estimate
19 you've spent since that first faithful call from Mr.
20 Finke in June of 2000 giving you and me this new avenue
21 of exploration?

22 A. I've forgotten how much time I spent in
23 Barbanti, I'm guessing it was a week to ten days or
24 so.

25 I had to make two trips, I remember we